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July 31, 2015

VIA ECF

Honorable Judge Laura Taylor Swain
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: LP Funding, LLC v. Tantech Holdings, Ltd.
Case No. 15cv4081

Dear Judge Swain:

We represent Plaintiff LP Funding, LLC ("LP Funding"), in the above-captioned matter. Pursuant to Rule A(2)(c) of your Honor's Individual Practices, Defendant Tantech Holdings, Ltd. ("Tantech") filed a letter motion ("Motion to Adjourn") (Docket Entry ("D.E.") 9) on July 29, 2015, requesting a thirty (30) day adjournment of the Initial Pre-Trial Conference originally scheduled for August 4, 2015, and a thirty (30) day extension of time to respond to LP Funding's 6-page Complaint (D.E. 1). On July 31, 2015, this Court granted Tantech's request to adjourn the Initial Pre-Trial Conference, and extended Tantech's time to respond to the Complaint to September 4, 2015 ("Order") (D.E. 10).

On the same day as this Court's Order, Tantech has requested, yet again, a further extension of time to respond to the 6-page Complaint (D.E. 11). Plaintiff LP Funding respectfully submits this letter in opposition to Tantech's requests on the grounds that this Court has already ruled on the extension request, and Tantech's counsel executed a Waiver of Service (D.E. 3) on June 3, 2015, which provided Defendant 60 days to respond to the Complaint. Therefore, Defendant already has one month and four days to respond to Plaintiff LP Funding's 6-page Complaint. As such, Defendant's latest request for an extension should be denied.

Sincerely,

A handwritten signature in black ink, appearing to read "Jenny Johnson-Sardella", written over a circular scribble.

Jenny Johnson-Sardella

cc: All Counsel of Record (via ECF)